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**COMMENTS ON THE REVISED SEWAGE
TREATMENT PLANT SOILS REMOVAL ACTION
WORK PLAN**

02/04/93

OEPA/DOE-FN

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LETTER



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

February 4, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

Attached are Ohio EPA's comments on the Revised STP Soils RAWP. If you have any questions about these comments, please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/klj

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Jim Saric, U.S. EPA
Dennis Carr, FERMC
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

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PARTIAL
ACTION RESPONSE
TO DOE-0782-93
(5421)

OHIO EPA COMMENTS
RA #14 WP ADD.

General Comments

1. DOE must initiate efforts to control access to, delineate the extent of, and potentially excavate off-property contamination. The off-property soil sampling detected concentrations of uranium exceeding the 35 pCi/g action level. Soil samples were not analyzed for additional radionuclides, which may add to the potential off-property exposure. DOE must revise Phase III of the Removal Action to address off-property soil contamination.

Specific Comments

1. Section 3.1, pg. 6, 2nd paragraph: The sampling of containers proposed here is not reflective of the sampling detailed in the original work plan. Sampling should be aimed at the initial surface soils, those most likely to receive airborne contaminants. Dioxin sampling should be aimed at these boxes.
2. Section 5.0, pg. 12, OFF-PROPERTY: DOE has failed to provide sufficient justification for not being pro-active towards the off-property contamination exceeding 35 pCi/g. DOE may not allow this contamination to simply wait for OUS characterization. Phase III of the removal action must be redesigned to address off-property contamination.
3. Section 5.0, pg. 12, OFF-PROPERTY: If DOE decides not to remove uranium levels >35 pCi/g, then DOE should take action (eg. fencing, acquisition, etc.) to limit to these areas until final remediation takes place.
4. Appendix I, Figure 1: Location number 11 detected uranium near 100 pCi/g and 30 pCi/g of thorium. Additionally cesium-137 and radium were detected. No additional sampling occurred around this point in any of the subsequent sampling points. DOE must include an evaluation of contamination in the area of the sampling location within the revised Phase III.
5. Appendix II, Radiological Walkover Survey: The walkover survey data supports the previous comment about additional sampling and potentially excavation around location number 11.
6. Appendix IV, Figure 2: Based upon review of the sampling locations and data, it is evident that DOE has failed to even delineate the extent of soils exceeding 35 pCi/g of uranium off-property. Phase III of the removal action should be aimed at addressing off-property soils with uranium concentrations in excess of 35 pCi/g as well as assessing other radionuclides present.

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7. Appendix IV, Table 3 and Figure 2: Since C-1 is 47.3 pCi/g, DOE needs to collect additional samples north and west of this point to determine the extent of contamination. This information will be necessary for the OU5 RI Report.
8. Appendix IV, Table 2, and Figure 2: Because ASI-2 is 152.0 pCi/g, DOE needs to collect additional samples between this point and C-4 to determine the extent of contamination and evaluate the need for excavation of on-property soils.
9. Appendix IV, Table 2: Is the data for locations #8 and #29 correct? The data indicates increasing concentrations with depth.